

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,)	
)	
Plaintiff,)	
)	Case No.: 09-3018-CV-S-RED
vs.)	
)	<u>Jury Trial Demanded</u>
TEXAS COUNTY, MISSOURI;)	
MICHAEL R. ANDERSON,)	
TEXAS COUNTY PROSECUTING)	
ATTORNEY; and)	
MICHAEL R. ANDERSON, individually)	
)	
Defendants.)	

NOTICE OF DEPOSITION

TO: Corey L. Franklin
The Lowenbaum Partnership, LLC
222 South Central Avenue, Ste. 901
St. Louis, MO 63105

Warren E. Harris
Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP
3315 East Ridgeview, Ste. 1000
Springfield, MO 65804

TIME AND DATE: Wednesday July 14, 2010 at 10:00 a.m.

**PLACE DEPOSITION
TO BE TAKEN:** 8000 Bonhomme Ave., Ste. 319
St. Louis, MO 63105

WITNESS TO BE DEPOSED: Elizabeth F. Pribor, M.D.

COURT REPORTER: JoAnn Richardson
20051 State Rt. B
St. James, MO 65559

PURPOSE OF DEPOSITION: All matters relevant to the discovery and/or subject of the
above-entitled cause of action.

**DOCUMENTS TO BE
PRODUCED:**

All documents reflecting the percentage of her income that Dr. Pribor derives from providing expert witness services, as well as documents containing financial information relating to expert services performed by Dr. Pribor on behalf of Defendant's counsel and other cases from Defense counsel retained by State Farm Insurance Company from January 1, 2006 through July 14, 2010.

Please take notice that at the above time, date and place, we shall cause the deposition of the above witness to be taken upon oral examination pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a shorthand reporter and a suitable Notary Public.

Any party or their attorney may appear and participate as they see fit.

Respectfully Submitted,

STEELMAN, GAUNT & HORSEFIELD

By: /s/ Stephen F. Gaunt
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Stephen F. Gaunt MO Bar #33183
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Stephen F. Gaunt, hereby certify that on the 7th day of July, 2010 the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to:

Corey L. Franklin
Ivan L. Schraeder
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222 South Central Avenue, Ste. 901
St. Louis, MO 63105
Counsel for Defendant Texas County, Missouri

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Counsel for Defendant Michael Anderson

/s/ Stephen F. Gaunt
Stephen F. Gaunt